

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

**UNOPPOSED MOTION FOR EXTENSION OF TIME ON
DEFENDANTS' ELEVENTH SIXTH-MONTH REPORT UNDER PAR. 261**

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department (“Defendants” and/or “PRPB”), by and through the undersigned counsel, and respectfully state and request as follows:

1. On March 5, 2020, the Parties and the Monitor held a Par. 253 and agreed that PRPB would submit its eleventh Par. 261 Sixth-Month Report (“the Report”) on May 1st, 2020, providing the Monitor sufficient time to review prior to the Monitor’s submittal of the second Compliance Monitoring Report (“CMR-2”) on May 15, 2020.
2. Shortly thereafter, Governor Wanda Vazquez-Garced declared a state of emergency due to COVID-19 outbreak (Executive Order 2020-023) and ordered the lockdown of the government, private entities and all citizens except for those providing essential services (Executive Order 2020-029).
3. Since the lockdown, PRPB’S Reform Office has been working remotely with information, data and communication limitations.
4. On April 22, 2020, the Court granted the Monitor a 60-day extension to prepare and submit its CMR-2, which could be further extended should the circumstances merit it. (Dkt. 1456).
5. In light of the above, the PRPB requests a 45-day extension from the May 1, 2020 deadline, that is, until June 15, 2020, to submit the Report.

6. Such request will not affect the Monitor's work schedule, since he will have enough time to review the Report prior to submitting the CMR-2 on or before July 14, 2020, or as otherwise extended.
7. PRPB conferred with both the Monitor and USDOJ and both informed they had no objections to the 45-day extension.

WHEREFORE, Defendants respectfully request that the Court grant this unopposed motion for extension of time and allow PRPB to file its Paragraph 261 Report on June 15, 2020.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 3rd day of May 2020.

By:

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